

**From:** Soraya Yanar Hanshew <syhlaw@outlook.com>  
**Sent:** Monday, March 11, 2024 12:50 PM  
**To:** Jill Bigler; Vanhooser, Bethany  
**Cc:** Greta Ravitsky; Chris Page McGinnis; Jackson, Sam  
**Subject:** Re: ANA DAVIS v. Wyoming National Logistics and SUPREME LABOR SOURCE et al.; 3:23-cv-00046-KC

\*\*\* EXTERNAL EMAIL \*\*\*

Counsel,

As you are all aware, numerous documents that indeed were requested in Plaintiff's discovery requests and were not objectionable, were identified as existent by your witnesses during Plaintiff's depositions, while such witnesses were under cross examination. Your witnesses identified numerous documents that were already in the possession of your clients, none of which had ever been produced, all of which fell within the confines of Plaintiff's prior requests.

You as counsel were aware of the existence of these documents at the time your witnesses identified such documentation during their depositions Wednesday and Thursday of last week, if not earlier. You acknowledged the same during the course of these depositions, and as such, all of this is on record.

I requested at that time Defendants supplement their discovery immediately in light of the knowledge of the existence of documents that are both relevant and had been previously requested but never produced, as the depositions continued. My correspondence to you last Friday simply memorializes these prior discussions and your prior acquiescence to produce the documents identified by your witnesses and never previously produced by Defendants.

As such, Plaintiff's motion to compel is ripe. Moreover, Defendants have yet to supplement their discovery as requested during the course of the depositions and Plaintiff must file her motion today in accordance with the Court's scheduling order.

If Defendants properly supplement their discovery responses between now and the hearing for the Motion to Compel, I will gladly update the Court on whatever supplementation has been provided.

Thank you,

Ms. Hanshew

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**From:** Jill Bigler <JBigler@ebglaw.com>

**Sent:** Monday, March 11, 2024 9:54 AM

**To:** Vanhooser, Bethany <bvanhooser@spencerfane.com>; Soraya Yanar Hanshew <syhlaw@outlook.com>

**Cc:** Greta Ravitsky <GRavitsky@ebglaw.com>; Chris Page McGinnis <CTPage@ebglaw.com>; Jackson, Sam <sjackson@spencerfane.com>

**Subject:** RE: ANA DAVIS v. Wyoming National Logistics and SUPREME LABOR SOURCE et al.; 3:23-cv-00046-KC

Soraya,

We are in receipt of your discovery deficiency letter, which you sent at 8:56 p.m. EST on Friday, March 8, 2024 and demanded the defendants produce a large number of documents by 12 p.m. EST on Monday, March 11, 2024 with the threat of filing a motion to compel should defendants not comply. As counsel for Supreme Labor stated to you this morning, the majority of the documents you have requested in your letter have not been previously requested by you, and, thus, cannot be requested through a discovery deficiency letter, particularly one with an arbitrary and unreasonable deadline. You essentially gave us (WY National's counsel) four business hours to comply. As new document requests, you are required to provide us 30 days to respond under FRCP 34, though, as counsel for Supreme pointed out, fact discovery closes today and, consequently, your new RFPs are improper. Additionally, many of the documents you have requested are overbroad and wholly irrelevant to the claims and defenses in this matter. Others are so vague that we are unable to discern what documents you are requesting or from whom you are requesting those documents. Finally, WY National has already produced several of the documents you request – e.g., Reports regarding plaintiff – see Bates WYN0000707-716; Code of Conduct – see Bates WYN0000056-73; Plaintiff's "employee file" – see Bates WYN0000055, 707-716; Plaintiff's attendance – see Bates WYN0000084, 652, 666, 705-706.

Subject to and without waiving the above or any other objections, we will agree to search for the following documents:

- Purchase orders from Rapid Deployment to Wyoming National for the Ft. Bliss Project
- Contents of Lina Arteada's "employee file"
- Any additional emails to Supreme requesting additional YCWs for Ft. Bliss
- Any additional documents in plaintiff's "employee file" that have not otherwise been produced
- Any additional documents related to YCW attendance at Ft. Bliss
- Any additional documents related to rosters or call back lists for Ft. Bliss

If you would like to discuss, I would be happy to schedule a meet and confer call with you this week.

EPSTEIN  
BECKER  
GREEN

**Jill Bigler** | [Bio](#)

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**From:** Vanhooser, Bethany <bvanhooser@spencerfane.com>

**Sent:** Monday, March 11, 2024 9:41 AM

**To:** Soraya Yanar Hanshew <syhlaw@outlook.com>

**Cc:** Greta Ravitsky <GRavitsky@ebglaw.com>; Jill Bigler <JBigler@ebglaw.com>; Chris Page McGinnis <CTPage@ebglaw.com>; Jackson, Sam <sjackson@spencerfane.com>

**Subject:** RE: ANA DAVIS v. Wyoming National Logistics and SUPREME LABOR SOURCE et al.; 3:23-cv-00046-KC

\*\*\* EXTERNAL EMAIL \*\*\*

Soraya,

As an initial matter, the requirement set forth in your letter sent on Friday evening at 7:56 p.m. CST for production of a substantial number of documents by this morning is unreasonable. Moreover, the items that you requested were either not previously requested and would therefore constitute entirely new requests for production under Rule 34 of the Federal Rules of Civil Procedure, which would not be permissible given the fact discovery deadline for this case, or are covered by our previous objections in response to your discovery requests (e.g., overly broad and unduly burdensome and completely lacking in relevance to any parties claims or defenses). Prior to your Friday (3/8) correspondence, Supreme Labor never received any deficiency letter from you regarding our October 13 discovery responses.

That being said, as discussed in the depositions last week, Supreme Labor has agreed to produce:

- Payroll sheets for the time period inclusive of Ms. Davis' employment, including from 5/17/21 to 10/25/21;
- Any Covid/sick sheets in our possession during the relevant time period;
- Any additional emails located from Wyoming requesting additional employees; and
- Information regarding Laura Luevano's death, if any.

We are finalizing these documents and will have those over to you as soon as possible today.

Thanks,

Bethany

**Bethany Vanhooser** Attorney  
Spencer Fane Bone McAllester

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 ☎ 615.238.6314  
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**From:** Soraya Yanar Hanshew <[syhlaw@outlook.com](mailto:syhlaw@outlook.com)>

**Sent:** Friday, March 8, 2024 7:56 PM

**To:** Jill Bigler <[JBigler@ebglaw.com](mailto:JBigler@ebglaw.com)>; Chris Page McGinnis <[CTPage@ebglaw.com](mailto:CTPage@ebglaw.com)>; Jackson, Sam <[sjackson@spencerfane.com](mailto:sjackson@spencerfane.com)>; Vanhooser, Bethany <[bvanhooser@spencerfane.com](mailto:bvanhooser@spencerfane.com)>

**Cc:** [gravitsky@ebglaw.com](mailto:gravitsky@ebglaw.com); Washington, DeAndrea <[dWASHINGTON@spencerfane.com](mailto:dWASHINGTON@spencerfane.com)>

**Subject:** [EXTERNAL] ANA DAVIS v. Wyoming National Logistics and SUPREME LABOR SOURCE et al.; 3:23-cv-00046-KC

[Warning] This E-mail came from an External sender. Please do not open links or attachments unless you are sure it is trusted.

Counsel,

Please see the discovery deficiency correspondence attached.

Than you,

Ms. Hanshew

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**From:** Soraya Yanar Hanshew <[syhlaw@outlook.com](mailto:syhlaw@outlook.com)>

**Sent:** Friday, March 8, 2024 1:08 PM

**To:** Jill Bigler <[JBigler@ebglaw.com](mailto:JBigler@ebglaw.com)>; Chris Page McGinnis <[CTPage@ebglaw.com](mailto:CTPage@ebglaw.com)>; Jackson, Sam <[sjackson@spencerfane.com](mailto:sjackson@spencerfane.com)>; Vanhooser, Bethany <[bvanhooser@spencerfane.com](mailto:bvanhooser@spencerfane.com)>

**Cc:** [gravitsky@ebglaw.com](mailto:gravitsky@ebglaw.com) <[gravitsky@ebglaw.com](mailto:gravitsky@ebglaw.com)>; Washington, DeAndrea <[dwashington@spencerfane.com](mailto:dwashington@spencerfane.com)>

**Subject:** CONFIDENTIAL SETTLEMENT DISCUSSION: ANA DAVIS v. Wyoming National Logistics and SUPREME LABOR SOURCE et al.; 3:23-cv-00046-KC

Counsel:

Please see the attached confidential settlement correspondence on behalf of my client ANA DAVIS.

Thank you,

Ms. Hanshew

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